

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Victoria Bibbs, PRO SE ,)

Plaintiff,)

Vs.) CIVIL ACTION

Bradley Foulk and Rick Schenker, and)

Gene Walczak and Micheal R. Cauley)

Defendants) NO. 04-349E

BRIEF IN SUPPORT OF PLAINTIFF NOTICE AND REQUEST

PURSUANT TO Fed. R.C.P. 11(a,b,c)(1-4)

1. Matthew J. McLaughlin filed a motion, along with brief in supporting of defendants,

2 District Attorney Bradley Foulk, County Executive Rick Shenker, Intake Case Worker for Office Of Children and Youth Services

3. Gene Walczak, and Counsel for Children and Youth Services, Micheal J. Cauley.

Exhibit-1

Jurisdiction

4. This court has jurisdiction over this matter pursuant to Fed. R.C.P. 11(a)(1),(b)(2) ;

Title 42 U.S.C § 1983; Title 42 U.S.C § 1985(1)(2)(3) Conspiracy to interfere with civil rights. ; Title 42 U.S.C. § 1986. Action for neglect to prevent conspiracy

Facts

5. On December 23, 2004 , Matthew J. McLaughlin, Attorney for the defendants, entered his appearance on behalf of the defendants, in the above - caption matter,

6. The defendants through Attorney Matthew J. McLaughlin files a motion to dismiss petitioners request for relief .

7. The defendants through Attorney Matthew J. McLaughlin Representation to the court (whether by signing, filling, submitting, or later advocating) a pleading, written motion, or other papers, an attorney or underrepresented party is certifying that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable

8. The Attorney Mathew J. McLaughlin, Esquire of record did willfully and deliberately attempt to avert plaintiff's petition for relief by submitting unsigned papers for court activity and having his signature forged by an unidentified representation to the Court (See Exhibit C)

9. by subverting through unsigned papers which intent to harass and to cause unnecessary delay or needless increase in the cost of litigation is a violation in itself and need to be void (See Exhibit (B)

10. Signature, Every pleading, written motion, and other paper shall be signed by at lease one attorney on record in the attorney's individual names, or if the party is not represented by an attorney, shall be signed by the party. (See Exhibit A, B, C.)

11. Each paper shall state the signer's address and telephone number, if any. (See Exhibit "C")

Except when otherwise specifically provided by rule or ststute, pleading needing not to be verified or accompanied by affidavit.

Exhibit-2

12. Under these circumstances in pursuant to Fed. R.C.P 11(a,b,c)(1-4) and consistent with the rule of the court of procedures "THE MOTION AND BRIEF IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS, " STRIKE IT FROM THE RECORD."

Wherefore, the Plaintiff demands judgment against the defendants for damages,..... and further ask for such other relief this court deems just and sanctions.

TRIAL BY JURY DEMANDED

Signature: Victoria Bibbs, Pro Se

Name: Victoria Bibbs, Pro Se

Address: 6023 Glade Drive

Erie, PA 16509

Telephone # (814) 864- 4181

Exhibit-3

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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JAN 21 2005

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Bibbs,) CIVIL ACTION NO. 04-CV-349
)
v.) Judge Susan P. Baxte
FOULK, et al) Judge Maurice B. Cohill, Jr.
)

JUDGMENT

**Defendants Foulk, et al , having failed to plead or otherwise defend in this
action, and default having been entered,**

**NOW, UPON APPLICATION OF THE Plaintiff and upon affidavit the
Defendant is indebted to the Plaintiff in the sum of \$ 3.5 million , that
Defendant is not an infant or incompetent person and not in the military
service of the United States, it is hereby**

**ORDERED, ADJUDGED AND DECREED, that Plaintiff recover of Defendants
the sum of \$3.5 million plus costs of this suit.**

CLERK

Dated: _____

Exhibit-4

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Bibbs,) CIVIL ACTION
)
 v.) Judge Susan P. Baxte
FOULK, et al) Judge Maurice B. Cohill, Jr.
) #: 04-CV-349

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the
within judgment Cost pursuant to Fed. R.C.P. was served upon the above
defendants Attorney on this 21st day of January 2005, via
United States first class mail, postage pre-paid in accordance with the
Rules.

Clerk, U.S. District Court

South Park Row

Erie, PA 16509

Exhibit-5

Matthew J. McLaughlin

Counsel for Defendants

246 West Tenth Street Erie, PA 16501

(814) 454-1010

Signature: Victoria Bibbs, Pro se
Name: Victoria Bibbs, Pro se

Address: 6023 Glade Drive

Erie, PA 16509

Telephone # (814) 864-4181

Exhibit 6